

WAYCROSS

BUILDING COMMUNITY THROUGH COMMUNICATIONS



August 6, 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video
Programming Guides and Menus, MB Docket No. 12-108, Notice of
Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

Waycross Community Media submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Waycross Community Media provides Public, Educational and Government Access programming services to our communities via Time Warner Cable. In 2012, we cablecast over 25,000 hours of programming. Our programming is available to over 26000 subscribers in the Cincinnati suburbs of Forest Park, Greenhills, Colerain Township and Springfield Township. OH.

We carry a number of programs that are closed captioned – including programming from Ohio Government TV, the Pentagon Channel, NASA and more. The onscreen video programming guide of our multichannel video programming distributor (MVPD), Time Warner Cable, does not provide a label or symbol indicating that these programs have closed captions. In fact, Time Warner does not even list these as community access channels on their electronic guide – and never have. Our Government access channel is listed as “EWTN”, with that channels programming filling the on-screen guide. Our Educational Access channel is listed as “Customer Information”. Our Public Access channels are listed as “TBN” (with their programming filling the on-screen guide) and “Customer information” respectively. This is, to say the least, confusing to viewers.

We have program descriptions and accessibility information readily available for all of our programs, including those with accessibility options such as

closed captions. Time Warner Cable has been asked repeatedly and continually refused to provide this information to our viewers. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Chip Bergquist', with a stylized, flowing script.

Chip Bergquist
Executive Director
chip@waycross.org